February 19, 1992

MEMORANDUM

Re: Possible Elements of an OSHA Indoor Air Quality Standard

The attached Statement Of Principles lists the basic features of an OSHA regulation designed to address indoor air quality that the industry regards as acceptable. If OSHA concludes that a general indoor air quality standard is warranted, however, it is likely to be urged to consider, and it may propose, a number of requirements beyond those listed in the Statement Of Principles. Such requirements may include:

(1) Application of an indoor air quality standard to hotels, restaurants and other private buildings, as well as to office buildings.

(2) Specific indoor air contaminant limits (for substances such as carbon dioxide, carbon monoxide, nicotine, radon and total particulates) for buildings that do not meet ASHRAE 62-1989 ventilation requirements.

(3) Maintenance of specified records relating to indoor air quality, including employee complaints of poor indoor air quality or associated health symptoms, measurements of indoor air contaminants or air flow rates, inspection results, and maintenance procedures.

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Source: https://www.industrydocuments.ucsf.edu/docs/pljj0000

(4) Development of a written indoor air quality plan.

(5) Prescribed employee education and training with respect to indoor air quality.

(6) Mandatory employee participation in developing an indoor air quality plan, monitoring air quality, investigating IAQ complaints and similar activities.

(7) Compliance with ASHRAE Standard 55-1981 governing temperature and humidity.

(8) Medical monitoring following identification of a possible indoor air quality problem.

(9) A higher specified ventilation rate for smoking lounges and other areas in which high levels of indoor air contaminants are likely to be present.

In addition, an OSHA IAQ standard based on the attached Statement of Principles may include more precise quantitative definitions of:

(1) "significant renovations" that would trigger ASHRAE ventilation requirements.

(2) a "reasonable cost" for modification of an HVAC system to meet ASHRAE standards.

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Source: https://www.industrydocuments.ucsf.edu/docs/pljj0000

(3) a "significant number of employee complaints" that would require steps to reduce indoor air contamination.

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